

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In Re: Gerald Keith Anderson and
Heather LeeMarie Hinkforth,

Case No. 22-24134-KMP

Debtors.

Chapter 7

Heather LeeMarie Hinkforth,

Plaintiff,

vs.

Adversary No. 24-02079-KMP

United States Department of Education,
Navient Solutions, LLC.,
Union Bank & Trust ELT Nat'l Ed Lns Netw,
Transitional Guaranty Agency,
ECSI Federal Perkins Loan Servicer,
Ascendium Education Solutions, Inc.,
Umb Bank Elt Navient Solutions LLC & Trust,
Milwaukee School of Engineering

Defendants.

**STIPULATION AND MOTION FOR ENTRY OF ORDER
DETERMINING STUDENT LOAN OBLIGATIONS TO UNITED STATES
DEPARTMENT OF EDUCATION
DISCHARGED PURSUANT TO 11 U.S.C. § 523(a)(8)**

Plaintiff Heather LeeMarie Hinkforth and Defendant United States Department of Education ("DOE"), by their respective undersigned attorneys, stipulate to the following and hereby move the Court to enter an order determining that Plaintiff's student loan obligations to DOE only are discharged:

1. Plaintiff is obligated to DOE on the below-listed fifteen (15) educational loans incurred between October 2001 and March 2011, currently totaling approximately \$88,954.79 (principal of \$73,768.75 and interest of \$15,186.04) ("Student Loans"):

Loan #	Loan Holder Name	Loan Date	Loan Amount	Loan Type	Loan Status	Principal ⁵	Interest	Date Entered Repayment ⁶
23	DEPT OF ED/NELNET	2011-03-18	\$ 3,650.00	DIRECT STAFFORD UNSUBSIDIZED	Forbearance	\$ 4,909.00	\$ 1,345.00	3/17/2012
22	DEPT OF ED/NELNET	2011-03-18	\$ 347.00	DIRECT STAFFORD SUBSIDIZED	Forbearance	\$ 390.00	\$ 58.00	3/17/2012
21	DEPT OF ED/NELNET	2010-09-03	\$ 3,650.00	DIRECT STAFFORD UNSUBSIDIZED	Forbearance	\$ 5,077.00	\$ 1,391.00	3/17/2012
20	DEPT OF ED/NELNET	2010-09-03	\$ 348.00	DIRECT STAFFORD SUBSIDIZED	Forbearance	\$ 391.00	\$ 58.00	3/17/2012
19	DEPT OF ED/NELNET	2009-12-25	\$ 6,000.00	DIRECT STAFFORD UNSUBSIDIZED	Forbearance	\$ 8,688.00	\$ 2,380.00	3/17/2012
18	DEPT OF ED/NELNET	2009-12-25	\$ 4,500.00	DIRECT STAFFORD SUBSIDIZED	Forbearance	\$ 5,191.00	\$ 964.00	3/17/2012
15	DEPT OF ED/ECSI FEDERAL PERKINS SERVICER	2006-11-17	\$ 2,000.00	FEDERAL PERKINS	Bankruptcy, Active	\$ 2,000.00	\$ 1,059.00	4/1/2008
14	DEPT OF ED/NELNET	2006-07-06	\$ 5,500.00	FFEL STAFFORD SUB	Forbearance	\$ 9,370.00	\$ 459.00	11/27/2007
13	DEPT OF ED/NELNET	2006-07-06	\$ 5,000.00	FFEL STAFFORD UNSUB	Forbearance	\$ 12,374.00	\$ 606.00	11/27/2007
12	DEPT OF ED/NELNET	2003-09-05	\$ 3,200.00	DIRECT STAFFORD UNSUBSIDIZED	Forbearance	\$ 4,626.00	\$ 794.00	11/27/2007
11	DEPT OF ED/NELNET	2003-09-05	\$ 2,800.00	DIRECT STAFFORD SUBSIDIZED	Forbearance	\$ 3,009.00	\$ 470.00	11/27/2007
10	DEPT OF ED/NELNET	2002-08-31	\$ 4,000.00	DIRECT STAFFORD UNSUBSIDIZED	Forbearance	\$ 5,955.00	\$ 1,022.00	11/27/2007

9	DEPT OF ED/NELNET	2002-08-31	\$ 2,625.00	DIRECT STAFFORD SUBSIDIZED	Forbearance	\$ 2,821.00	\$ 441.00	11/27/2007
8	DEPT OF ED/NELNET	2001-10-25	\$ 4,000.00	DIRECT STAFFORD UNSUBSIDIZED	Forbearance	\$ 6,146.00	\$ 1,055.00	11/27/2007
7	DEPT OF ED/NELNET	2001-10-25	\$ 2,625.00	DIRECT STAFFORD SUBSIDIZED	Forbearance	\$ 2,821.00	\$ 441.00	11/27/2007

2. These Student Loans are dischargeable as to Plaintiff pursuant to 11 U.S.C. § 523(a)(8), as repayment would impose an undue hardship.

3. Plaintiff and DOE agree to the entry of an order determining the Student Loans to be dischargeable and closing this adversary proceeding, with the parties bearing their own costs.

Dated this 22nd day of January, 2025.

Respectfully submitted,

/s/ Deborah A. Stencel
Deborah A. Stencel
Miller & Miller Law, LLC
700 W Virginia Ste 605
Milwaukee, WI 53204-1515
(414) 395-4501
deborah@millermillerlaw.com
Attorney for Plaintiff

-and-

GREGORY J. HAANSTAD
United States Attorney

By: s/ Luke Sinclair

LUKE P. SINCLAIR
Assistant United States Attorney
Wisconsin Bar No. 10857786
Office of the United States Attorney
Eastern District of Wisconsin
517 E Wisconsin Ave, Rm 530
Milwaukee, WI 53202
Phone: (414) 297-1700
Fax: (414) 297-4394
luke.sinclair@usdoj.gov
*Attorneys for Defendant United States
Department of Education*